

Exhibit A

(Plaintiff's Affidavit sworn
to and dated March 9, 2020)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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TIMOTHY POWERS,

Plaintiff,

-against-

Docket No.: 2:19-cv-04738 (MKB)
(SMG)

ROMAN CATHOLIC DIOCESE OF ROCKVILLE
CENTRE, ST. MARTIN OF TOURS CHURCH and
ROBERT GUGLIELMONE,

AFFIDAVIT

Defendants.
-----X

COUNTRY OF THAILAND)
)
PROVINCE OF CHONBURI) ss.:
)
DISTRICT OF BANGLAMUNG)

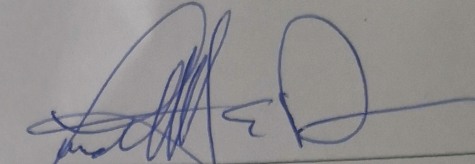
I, TIMOTHY POWERS, being duly sworn, deposes and says:

1. I currently reside and have resided at the Paradise Park Resort Condominiums in Soi Wat Boon, Pattaya, Thailand 20150 with my wife and two daughters since I moved to Thailand in 2015.
2. As such, I submit this affidavit in support of the instant motion to remand this action to state court.
3. While I was not asked during my jurisdictional deposition whether I have the intention to make Thailand my domicile, if I had been asked, I would have responded that I do intend to make Thailand my domicile.
4. In fact, since moving to Thailand in 2015, I have not returned to the United States of America, nor do I ever intend on returning to reside and/or have my domicile in the United States of America.
5. Additionally, since moving to Thailand in 2015, I have only left the country once, when I went to Laos for one day to convert my educational (ED) visa to a marriage visa.


6. In summation, I have set up a happy life here in Thailand with my wife and my family and I intend on remaining in Thailand and being domiciled here for the remainder of my life.

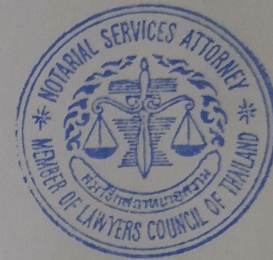
WHEREFORE, I swear under penalty of perjury of law that the foregoing is true and correct.

Dated: New York, New York
March ____, 2020


TIMOTHY POWERS

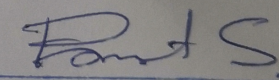
Sworn to before me this
9 day of March 2020


Notary Public



Reg.No./ทะเบียนเลขที่ 9805/2562
Commission Expires/ทะเบียนหมดอายุ
Date/วันที่ 21 September 2021

On 9 March 2020, I hereby certify that the signature on this document
is the genuine signature of Mr. Timothy Edward Powers,
who signed before me and provided his/her original passport with
number 561392610 as identification. I hereby assume no
responsibility for its contents.

Signed: 
(Mr. Pavarest Srichanok)
Lawyer/Notarial Services Attorney
Reg. No. 9805/2562
Magna Carta Law Office
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Nongprue, Banglamung, Chonburi 20150 Thailand
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Email: pavarest@magnacarta.co.th
Date: 9 March 2020